

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**THE LUTHERAN CHURCH – MISSOURI
SYNOD, a Missouri nonprofit corporation
*Plaintiff,***

V.

**DONALD CHRISTIAN, CHRISTOPHER
BANNWOLF, CONCORDIA
UNIVERSITY TEXAS, INC., & JOHN
DOES 1-12**
Defendants



Case No. 1:23-cv-1042-DE
[Consolidated with 1:24-cv-00176-DE]

DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT

NOW COMES Concordia University Texas (“CTX”) Defendant in the above-captioned cause, and file this Unopposed Motion for Leave to Exceed Page Limit as follows:

Defendant is filing a response to Plaintiff Lutheran Church – Missouri Synod – a Missouri non-profit corporation’s (“LCMS”) Motion to Compel. Pursuant to Local Rule CV-7(C)(2), the page limit for a discovery motion and response is limited to 10 pages. The Defendant needs additional pages to adequately address all of the legal and factual issues supporting its motion. Therefore, Defendant is requesting that they be granted leave to file its Response to Plaintiff’s Motion to Compel not to exceed 22 pages in length. Attached to this motion is Defendant’s Response with Exhibits 1-6, and the proposed Protective Order.

This motion is not sought for delay but so that justice may be served.

WHEREFORE PREMISES CONSIDERED, Defendant CTX prays that the Court enter an order granting this motion to exceed page limit.

Respectfully submitted,

/s/ Daniel R. Richards

Daniel R. Richards

State Bar No. 00791520

drichards@rrsfirm.com

Clark Richards

State Bar No. 90001613

crichards@rrsfirm.com

Albert A. Carrion, Jr.

State Bar No. 03883100

acarrion@rrsfirm.com

RICHARDS RODRIGUEZ & SKEITH, LLP

611 West 15th Street

Austin, Texas 78701

Telephone: (512) 476-0005

Facsimile: (512) 476-1513

ATTORNEYS FOR DEFENDANTS

CONCORDIA UNIVERSITY TEXAS, INC.,

DONALD CHRISTIAN AND CHRISTOPHER

BANNWOLF

CERTIFICATE OF CONFERENCE

I certify that on October 29, 2024, I conferred with counsel for Plaintiff about the relief being sought in this motion and Plaintiff does not oppose this motion.

/s/ Albert A. Carrion, Jr.

ALBERT CARRION

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October 2024, I electronically filed the above and foregoing document, which will send notification of such filing to:

Steven C. Levatino
Levatino & Pace PLLC
1101 S. Capital of Texas Hwy.
Bldg. K, Suite 125
Austin, Texas 78746
steven@lpfirm.com

Andrew F. MacRae
MacRae Law Firm PLLC
3267 Bee Cave Road
Suite 107, PMB 276
Austin, Texas 78746
andrew@macraelaw.co

Gregg R. Kronenberger
Kronenberger Law Firm, PLLC
1101 S. Capital of Texas Hwy.
Bldg. K, Suite 125
Austin, Texas 78746
gregg@gkronenberger.com

/s/ Daniel R. Richards

DANIEL R. RICHARDS